

1 Zia F. Modabber (CA 137388)
zia.modabber@kattenlaw.com

2 Tami Kameda Sims (CA 245628)
tami.sims@kattenlaw.com

3 **KATTEN MUCHIN ROSENMAN LLP**

4 2029 Century Park East, Suite 2600

5 Los Angeles, CA 90067-3012

6 Telephone: 310.788.4400

7 Facsimile: 310.788.4471

8 Attorneys for Defendant and Counterclaimant
9 CLAUDETTE ROBINSON

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 WILLIAM ROBINSON, JR., an
13 individual,

14 Plaintiff,

15 vs.

16 CLAUDETTE ROGERS ROBINSON,
an individual,

17 Defendant.

18
19 AND RELATED COUNTERCLAIMS
20

Case No.: 2:14-cv-01701-JAK-FFM

21 **JOINT REPORT REGARDING**
22 **STATUS OF SETTLEMENT**
23
24
25
26
27
28

JOINT REPORT REGARDING STATUS OF SETTLEMENT

Pursuant to the Court's instruction in its Order of November 13, 2014, Plaintiff William Robinson, Jr. ("Plaintiff") and Defendant Claudette Robinson ("Defendant") hereby submit the following Joint Report Regarding the Status of Settlement.

The parties have reached a settlement in principle. Plaintiff has prepared an initial draft settlement agreement, and Defendant is preparing her revisions and comments thereto. Due to the complexity of the settlement issues involved in reducing the parties' agreement to a long form, which issues include having to address different income streams, and possible future uses and disposition of the copyrights and income streams, the parties require additional time to finalize their settlement agreement. The agreement also requires input from family law and music transactional counsel, in addition to litigation counsel. As such, the parties respectfully request that the Court grant them a continuance so that they can continue to work together to resolve and document all issues, and dismiss the lawsuit.

Accordingly, the parties jointly request that the Court (1) continue the hearing on the order to show cause from December 15, 2014, to January 19, 2015 at 1:30 p.m. and (2) continue the deadline to file a dismissal until January 15, 2015.

Dated: December 11, 2014

FOX ROTHSCHILD LLP

By: /s/ Patrick J. Hagan
Patrick J. Hagan
Attorneys for Plaintiff and Counterdefendant
WILLIAM ROBINSON, JR.

Dated: December 11, 2014

KATTEN MUCHIN ROSENMAN LLP

By: /s/ Zia F. Modabber
Zia F. Modabber
Attorneys for Defendant and
Counterclaimant
CLAUDETTE ROBINSON